

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-01570 (GBD)(SN) ECF Case
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This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., 02-cv-06977

Gladys H. Salvo, et al. v. Al Qaeda Islamic Army, et al., 03-cv-05071

Federal Insurance Co., et al. v. Al Qaida, et al., 03-cv-06978

Thomas E. Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., 03-cv-09849

Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., 04-cv-01923

Continental Casualty Co., et al. v. Al Qaeda, et al., 04-cv-05970

Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., 04-cv-07065

Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al., 04-cv-07279

DECLARATION OF AISHA E. R. BEMBRY

I, Aisha E. R. Bembry, declare and say that the following statements are true as a matter of my personal knowledge:

1. I am a partner at the law firm of Lewis Baach Kaufmann Middlemiss PLLC and a member in good standing of the District of Columbia Bar and the Maryland Bar and have been admitted *pro hac vice* as counsel for defendants Muslim World League (“MWL”) and the International Islamic Relief Organization (“IIRO”). I make this declaration in support of the Defendants’ Memorandum of Law in Opposition to Plaintiffs’ Motion to Exclude Expert Testimony of Jonathan Benthall, Chas Freeman, Jonathan Marks, and John Sidel. in the above-captioned case, filed on January 14, 2022.

2. Attached hereto are true and correct copies of the following documents:

Exhibit AA	<p>Excerpts from the Expert Report of Jonathan M. Winer, dated March 10, 2020</p> <ul style="list-style-type: none"> The complete Expert Report is attached as Exhibit A to the Declaration of Aisha E. R. Bembry in support of the Memorandum of Law in Support of Defendants' Joint Motion to Exclude Expert Testimony of Jonathan Winer and Brian Michael Jenkins.
Exhibit AB	Excerpts from the Expert Report of Victor Comras, dated Oct. 29, 2020
Exhibit AC	Excerpts from the Expert Report of Evan Kohlmann, undated
Exhibit AD	<p>Excerpts from the Expert Report of Jonathan Benthall on behalf of Yassin Abdullah Kadi, dated Feb. 1, 2021</p> <ul style="list-style-type: none"> The complete Expert Report is attached as Exhibit 2 to the Declaration of Robert T. Haefele Transmitting Evidence in Support of Plaintiffs' Memorandum of Law in Support of Plaintiffs' Daubert Motion to Exclude and/or Limit Proposed Testimony of Defendants' Proposed Experts, Jonathan Benthall, Charles W. Freeman, Jonathan Marks, and John Sidel (the "Haefele Declaration")
Exhibit AE	Excerpts of the transcript of the July 23, 2021 deposition of Victor Comras
Exhibit AF	<p>Excerpts from the Expert Report of Jonathan Benthall on behalf of MWL, the IIRO, and Drs. Naseef, Al-Obaid, Al-Turki and Basha, dated Aug. 3, 2020</p> <ul style="list-style-type: none"> The complete Expert Report is attached to as Exhibit 1 the Haefele Declaration.
Exhibit AG	Excerpts from the July 20, 2021 deposition of Jonathan Benthall, attaching Errata Sheet
Exhibit AH	Excerpts from <i>The 9/11 Commission Report: Final Report of the National Commission on Terrorist Attacks Upon the United States (9/11 Report)</i> , July 22, 2004
Exhibit AI	Third Amended Consolidated Master Complaint, <i>Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.</i> , 02-cv-06977, dated Sept. 5, 2003
Exhibit AJ	Complaint, <i>Continental Casualty Co., et al. v. Al Qaeda, et al.</i> , 04-cv-05970, dated Aug., 30 2004 and filed Sept. 1, 2004
Exhibit AK	Third Amended Complaint, <i>Thomas E. Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.</i> , filed and dated Nov. 22, 2002

Exhibit AL	<p>Excerpts from the Expert Report of Chas Freeman on behalf of the World Assembly of Muslim Youth (“WAMY”), dated Aug. 5, 2020</p> <ul style="list-style-type: none"> • The complete Expert Report is attached as Exhibit 3 to the Haefele Declaration.
Exhibit AM	Excerpts from the Affirmation of Evan Francois Kohlmann, dated Feb. 3, 2015
Exhibit AN	Curriculum Vitae of Chas Freeman
Exhibit AO	Excerpts from the April 6, 2021 deposition of Chas Freeman
Exhibit AP	Excerpts from the Oct. 23, 2019 deposition of Saleh Wohaibi as a FRCP 30(b)(6) designee of WAMY
Exhibit AQ	<p>Excerpts from the Expert Report of Jonathan Marks on behalf of WAMY, dated Aug. 7, 2020</p> <ul style="list-style-type: none"> • The complete Expert Report is attached as Exhibit 4 to the Haefele Declaration.
Exhibit AR	Excerpts from the July 22, 2021 deposition of Jonathan Marks
Exhibit AS	Appendix A to the Expert Report of Jonathan Marks
Exhibit AT	Appendix B to the Expert Report of Jonathan Marks
Exhibit AU	Marks Deposition Transcript Exhibit 962, Invoice from Baker Tilly to Law Firm of Omar T. Mohammedi, LLC, dated Feb. 19, 2020
Exhibit AV	Excerpts from the Report of the Canada Revenue Agency, dated Jan. 5, 2012
Exhibit AW	Excerpts from the July 13-14, 2021 deposition of Jonathan Winer
Exhibit AX	Excerpts from the Declaration of Mohammed Al Khatib, dated March 29, 2018
Exhibit AY	Excerpts from the Declaration of Ibrahim Sulayman Abdullah, filed April 2, 2018
Exhibit AZ	Excerpts from the Expert Report of Matthew Levitt, dated Mar. 9, 2020
Exhibit AAA	Excerpts from the April 7-8, 2021 deposition of Matthew Levitt
Exhibit AAB	Excerpts from the Rebuttal Expert Report of Evan Kohlmann, dated Feb. 2, 2021
Exhibit AAC	Excerpt from the Aug. 5-6, 2021 deposition of Evan Kohlmann

Exhibit AAD	Excerpts from the Declaration of Dr. Abdul Wahab Noorwali in Support of Defendant World Assembly of Muslim Youth, filed March 30, 2018
Exhibit AAE	Sidel Deposition Transcript Exhibit 602
Exhibit AAF	Excerpts from the Expert Report of John Sidel on behalf of MWL, the IIRO, and Drs. Naseef, Al-Obaid, Al-Turki, and Basha, dated July 29, 2020. <ul style="list-style-type: none"> The complete Expert Report is attached as Exhibit 5 to the Haefele Declaration
Exhibit AAG	Excerpts from the April 27, 2021 deposition of John Sidel
Exhibit AAH	Excerpt from the Feb. 20-21, 2019 deposition of Adnan Basha
Exhibit AAI	Excerpt from the Mar. 26-27, 2019 deposition of Fahd Mohammad Sanad Al-Harbi
Exhibit AAJ	Excerpt from the June 27, 2019 deposition of Abdulhadi Daguit
Exhibit AAK	Sidel Deposition Transcript Exhibit 605
Exhibit AAL	Sidel Deposition Transcript Exhibit 606
Exhibit AAM	Joint Letter to the Honorable Sarah Netburn, United States Magistrate Judge, concerning outstanding issues in connection with the discovery related to Yassin Kadi, dated Oct. 13, 2021

Dated: January 14, 2022

/s/ Aisha E. R. Bembry

Aisha E. R. Bembry